

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
SMG, an infant by his parent and natural guardian
ATAVIA MOORER; and ATAVIA MOORER,
individually.

Index No. 1:14-cv-00815-VSB
Date Filed: 02/10/2014

Answer to City's Cross-Claims

Plaintiff(s),

-against-

SCO FAMILY OF SERVICES, DARLENE ELLISON,
individually and as caseworker with SCO Family of
Services; "JANE ROE" and as supervisor with SCO Family
of Services; "JOHN DOE" (being a fictitious name),
individually, and as caseworker with SCO family of
Services; GAIL B. NAYOWITH, individually, and as
Director of SCO Family of Services; JOANNA KELLMAN,
individually, and as caseworker with for the Administration
for Children's Services of the City of New York;
EMMANUEL CHIJOKE, individually and as supervisor
with for the Administration for Children's Services of the
City of New York; and the CITY OF NEW YORK;

Defendant(s).

-----X
C O U N S E L O R S:

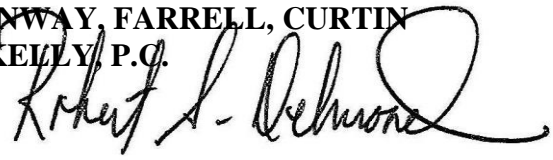
Defendant, , by its attorneys CONWAY, FARRELL, CURTIN & KELLY, P.C.,
as and for its Answer to City of New York's cross-claims

1. Upon information and belief, denies each and every allegation contained
in paragraph 107 of the City of New York's Cross-Claim except admits that SCO Family of
Services entered into a contract with the City of New York to provide foster care services.

2. Upon information and belief, denies each and every allegation contained
in paragraphs 108,109,110 of the City of New York's Cross-Claims.

DATED: New York, New York
May 5, 2014

CONWAY, FARRELL, CURTIN
& KELLY, P.C.



By: _____

Robert S. Delmond(RSD9724)

Attorneys for Defendant, SCO FAMILY OF
SERVICES, INC., GAIL NAYOWITH and
DARLENE ELLISON

48 Wall Street – 20th Floor

New York, N.Y. 10005

(212) 785-2929

TO:

BRUCE A. YOUNG, ESQ.

100 Church St., Ste 800

New York, NY 10007

212 965-0050

Attorneys for Plaintiffs

ZACHARY W. CARTER

100 Church Street Room 2-306

New York, NY 10007

**Attorneys for CITY OF NEW YORK C/O NYC CORPORATION COUNSEL, Joanna
Kellman & Emmanuel Chijioke**